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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

Hon. Ronald J. Hedges

v.

Mag. No. 05-

MELVIN MURILLO,  
a/k/a "Perica,"

JULIO MURILLO,  
a/k/a "Periquito,"

RONAL MURILLO,  
a/k/a "Abejon,"

WILBUR LARIN ROMERO,  
a/k/a "Pili,"  
a/k/a "Bear,"

ANTHONY ROMERO,  
a/k/a "Lacho,"

DAVID NARANJO-MENESES,  
a/k/a "Felipe Arboleda,"  
a/k/a "Gordo,"

MARBER RAMIREZ,  
a/k/a "Cucho,"  
a/k/a "Taliban,"

ELMER ANTONIO LANDAVERDE,  
a/k/a "Chele,"  
a/k/a "Cheleherba,"

DELVIN ZUNIGA,  
a/k/a "Didier Zuniga,"  
a/k/a "Compa,"

MAYKOL RANGEL-MUNOZ,  
a/k/a "The Colombian,"  
a/k/a "Parse,"  
a/k/a "Mike,"

HECTOR MARTINEZ,  
MICHAEL JIMENEZ,

a/k/a "Michael Anthony Jimenez," and

JOSE RODRIGUEZ,  
a/k/a "Latte,"

**CRIMINAL COMPLAINT**

I, John G. Farrell, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about the dates set forth in the accompanying affidavit, in the County of Union, in the District of New Jersey and elsewhere, defendants,

**COUNT ONE**

(Conspiracy to Distribute Cocaine and Cocaine Base)

MELVIN MURILLO,  
a/k/a "Perica,"

WILBUR LARIN ROMERO,

a/k/a "Pili,"  
a/k/a "Bear,"  
ANTHONY ROMERO,  
a/k/a "Lacho,"  
DAVID NARANJO-MENESES,  
a/k/a "Felipe Arboleda,"  
a/k/a "Gordo,"  
MARBER RAMIREZ,  
a/k/a "Cucho,"  
a/k/a "Taliban,"  
ELMER ANTONIO LANDAVERDE,  
a/k/a "Chele,"  
a/k/a "Cheleherba,"  
DELVIN ZUNIGA,  
a/k/a "Didier Zuniga,"  
a/k/a "Compa,"  
MAYKOL RANGEL-MUNOZ,  
a/k/a "The Colombian,"  
a/k/a "Parse,"  
a/k/a "Mike,"  
MICHAEL JIMENEZ,  
a/k/a "Michael Anthony Jimenez," and  
JOSE RODRIGUEZ,  
a/k/a "Latte,"

did knowingly and intentionally conspire with each other and with others to distribute and possess with the intent to distribute quantities of cocaine and cocaine base, each of which are Schedule II narcotic drug controlled substances, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21 United States Code section 846.

**COUNT TWO**

(Conspiracy to Transfer False Identification Documents)

JULIO MURILLO,  
a/k/a "Periquito,"  
RONAL MURILLO,  
a/k/a "Abejon," and  
HECTOR MARTINEZ,

did knowingly and intentionally conspire with each other and with others to knowingly transfer a false identification document knowing such document was produced without lawful authority, contrary to Title 18, United States Code, Section 1028(a)(2)

In violation of Title 18, United States Code, Section 371

I further state that I am a Special Agent of the Bureau of Immigration and Customs Enforcement and that this complaint is based on the facts set forth in the accompanying affidavit:

SEE AFFIDAVIT OF JOHN G. FARRELL

which is made a part hereof.

\_\_\_\_\_  
John G. Farrell  
Bureau of Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

\_\_\_\_\_, at Newark, New Jersey

HONORABLE RONALD J. HEDGES  
UNITED STATES MAGISTRATE JUDGE

\_\_\_\_\_  
Signature of Judicial Officer

